

## Response ID ANON-B3JU-DS7E-7

Submitted to **Local Development Plan Main Issues Report 2019 Consultation**  
Submitted on **2019-05-08 14:50:19**

### About You

**What is your name?**

**Name:**

Fraser Littlejohn

**What is your organisation?**

**Organisation:**

Montagu Evans

**On behalf of:**

M&G Real Estate

**How can we contact you?**

**Email:**

[REDACTED]

**Telephone:**

[REDACTED]

**Address:**

[REDACTED]  
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[REDACTED]  
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### How to Complete

#### 1 Introduction

**Section 1 provides a context for the Main Issues Report Do you have any comments in relation to this section?**

**Do you have any comments in relation to this section?:**

Please refer to attached statement.

#### 2 Settlement Strategy

##### Question 1 New Housing Sites

**Do you agree with our preferred housing sites? Are there any other sites that would be suitable for housing?:**

N/A

##### Question 2 Housing Allowances Beyond 2032

**Is there a need for us to identify further Housing Allowances or sites for the period beyond 2032?:**

N/A

##### Question 3 Brownfield and other Opportunity Sites

**Are there any further brownfield or other opportunity sites which would be suitable for redevelopment?:**

N/A

##### Question 4 New Healthcare Facilities

**Do you have any comments on these sites? Are there any other sites in these areas that we should be considering?:**

N/A

#### 3 Aberdeen City Centre and the Network of Centres

##### Question 5 City Centre Boundary

**Do you agree the Local Development Plan should modify its City Centre boundary to match the City Centre boundary shown in the City Centre Masterplan?:**

Please refer to attached statement.

#### **Question 6 City Centre Masterplan Intervention Areas**

**Do you agree that the City Centre Masterplan intervention areas should be identified as opportunity sites within the Local Development Plan?:**

Please refer to attached statement.

#### **Question 7 City Centre Retail Core**

**Should the retail core be reduced to focus on a more compact area of Union Street and the existing shopping centres?:**

Please refer to attached statement.

#### **Question 8 Union Street Frontages**

**Should the Union Street Frontages percentages be reviewed? Do the current target percentages ensure there is a balance between a strong retail focus and allowing for other uses? What other uses should we allow on the retail core area of Union Street:**

Please refer to attached statement.

#### **Question 9 Out of Town Retailing**

**Should we direct high footfall uses to existing centres including the City Centre? Should we consider new out of town retail parks? What would the impact of these be on Union Street and the City Centre, and Aberdeen's network of centres?:**

Please refer to attached statement.

#### **Question 10 Commercial Leisure Uses**

**Should we continue to direct commercial leisure uses towards existing centres and the beach and leisure area?:**

Please refer to attached statement.

#### **Question 11 City Centre Living**

**How can we encourage more people to live in the City Centre? Would a document outlining the principles which need to be applied in converting a building into residential use be helpful?:**

N/A

#### **MAIN ISSUE 1 Living in the City Centre**

**Should we include a policy in the Local Development Plan supporting residential development in the City Centre, including the conversion of upper and basement floors of premises to provide residential accommodation?:**

N/A

Not Answered

#### **Question 12 Residential Development in the City Centre**

**Are there any other locations within the City Centre where residential accommodation could be provided?:**

N/A

#### **MAIN ISSUE 2 A 24-Hour City**

**Should 24-hour activities in Aberdeen be supported and encouraged to grow, especially in the City Centre? Could this be achieved through policy?:**

N/A

Not Answered

#### **Question 13 Encouraging the Creative Arts**

**What can we do to support and encourage the creative sector to ensure a range of distinctive experiences so that Aberdeen City Centre is like no other place?:**

N/A

#### **Question 14 Proposals for Creative Arts**

**Are there other buildings or areas within Aberdeen that could accommodate the existing, and support an emerging creative sector for desk-based and studio-based artists?:**

N/A

#### **Question 15 Percent for Art**

To ensure Aberdeen City Centre retains its distinctiveness, should developments with construction costs of £1 million or over be required to allocate at least 1% of construction costs for the inclusion of art projects in a publicly accessible/ visible place or places within the development?:  
N/A

### **MAIN ISSUE 3 Support for Visitor Attractions**

To support our existing visitor attractions should Aberdeen have a policy about protecting and growing visitor attractions?:  
N/A

Not Answered

## **4 Quality Places**

### **MAIN ISSUE 4 Minimum Internal Space Standards for New Residential Development**

How can we ensure that new residential development delivers an adequate amount of internal floor space for future occupants?:  
N/A

Not Answered

### **Question 16 External Space Standards**

Do you think that the amenity spaces currently delivered are of a sufficient quality? Should we strive for a better quality/ quantity of private/ semi-private residential amenity space across the city and refuse planning permission to proposals which do not meet our high standards? What standards would you like to see set for new dwellings, flats, and conversions in respect of quality and quantity of external amenity space?:  
N/A

### **Question 17 Natural Environment**

Do you agree that the proposed list of policies for Natural Environment gives a clearer and more coherent structure than at present?:  
N/A

### **Question 18 Food Growing**

How can the Local Development Plan support the delivery of food growing projects in the City? Do you think food growing should be included in the next Plan by way of a new policy, or through existing policy and guidance?:  
N/A

## **5 Transport and Infrastructure**

### **Question 19 City Centre Parking**

Should we reduce car parking in the City Centre to support the City Centre Masterplan? If so, how?:  
N/A

### **MAIN ISSUE 5 Electric Vehicle Charging Infrastructure**

How best can we encourage the provision of infrastructure to support changes in transport technologies? :  
N/A

Not Answered

### **Question 20 Digital Infrastructure**

Should high speed broadband be mandatory in all new residential developments with 5 or more units? Do you wish to suggest any other proposed changes to the Digital Infrastructure and Telecommunications Infrastructure policies?:  
N/A

### **Question 21 Developer Obligations and Infrastructure Delivery**

Do we need to change our approach to securing developer obligations for future development proposals?:  
N/A

## **6 Resource and Business Policy**

### **MAIN ISSUE 6 Low and Zero Carbon Generating Technologies and Water Efficiency**

Should the requirement of existing Policy R7 be changed?:  
N/A

Not Answered

#### **Question 22 Low and Zero Carbon Generating Technologies and Water Efficiency**

**What methodology should the Council use in calculating compliance with Policy R7, specifically how should the target of reducing carbon dioxide levels be calculated?:**

N/A

#### **Question 23 Solar Farm Developments**

**Do you agree that Solar Farms should be supported within the Council's policy on Renewable and Low Carbon Energy developments, and should specific guidance be included within Policy R8?:**

N/A

#### **MAIN ISSUE 7 Heat Networks**

**Should we include a policy in the Local Development Plan supporting the development of Heat Networks within the City?:**

N/A

Not Answered

#### **Question 24 Supporting Business and Industrial Development**

**Should we carry forward our current policy approach to safeguarding existing business and industrial areas from other development pressures into the next Local Development Plan?:**

N/A

#### **MAIN ISSUE 8 West End Office Area**

**Should the policy support a mix of uses in the West End Office Area? If so, what types?:**

N/A

Not Answered

### **7 Affordable Housing**

#### **Question 25 Affordable Housing**

**Do you agree with the Local Development Plan's current affordable housing approach being carried forward? What other measures could the Council consider in order to assist with the delivery of affordable housing units via the Plan? Should the threshold of not applying affordable housing requirements to developments smaller than 5 units remain in place?:**

N/A

#### **Question 26 Private Rented Accommodation and Build to Rent**

**Are there ways that the Local Development Plan can facilitate Build to Rent development, through policy?:**

N/A

### **8 Sustainable Mixed Communities**

#### **MAIN ISSUE 9 Inclusive Housing Mix (Housing for the Elderly and Accessible Housing)**

**How can the Local Development Plan ensure a greater mix of housing types is achieved in new developments?:**

N/A

Not Answered

#### **MAIN ISSUE 10 Residential Care Facilities**

**How should the Local Development Plan cater for proposals relating to Residential Care Facilities?:**

N/A

Not Answered

#### **MAIN ISSUE 11 Student Accommodation**

**How can the Local Development Plan cater to proposals relating to student accommodation?:**

N/A

Not Answered

## **MAIN ISSUE 12 Houses in Multiple Occupation**

**How can the Local Development Plan support sustainable mixed communities, with regards to HMOs?:**

N/A

Not Answered

**Percentage limit of HMOs in each area:**

**Please explain why you chose your answer:**

**Geographical boundary of each area:**

**Please explain why you chose your answer:**

**Threshold for when planning permission is required for a HMO:**

**Please explain why you chose your answer:**

### **Question 27 Community Planning**

**Is there anything else that the Local Development Plan can do to support the objectives of the LOIP or the aims of Community Planning?:**

N/A

### **Question 28 Changing Places Toilets**

**Should large new developments that require public access provide Changing Places toilets? What types of venues should provide them?:**

N/A

## **Appendix 1 Proposed Draft New Policies**

### **Policy D2 Amenity**

**Do you have any comments on the policy?:**

N/A

### **Policy D5 Advertisements and Signage**

**Do you have any comments on the policy?:**

N/A

### **Policy D8 Shopfronts**

**Do you have any comments on the policy?:**

Please refer to attached statement.

### **Policy D9 Windows and Doors**

**Do you have any comments on the policy?:**

N/A

### **Policy H4 Housing Mix and Housing for Particular Needs**

**Do you have any comments on the policy?:**

N/A

### **Policy H8 Residential Care Facilities**

**Do you have any comments on the policy?:**

N/A

### **Policy H9 Student Accommodation Developments**

**Do you have any comments on the policy?:**

N/A

### **Policy H10 Houses in Multiple Occupation**

**Do you have any comments on the policy?:**

N/A

**Policy NC9 City Centre Living**

**Do you have any comments on the policy?:**

N/A

**Policy NC10 24-hour City**

**Do you have any comments on the policy?:**

N/A

**Policy NC11 Visitor Attractions and Facilities**

**Do you have any comments on the policy?:**

N/A

**Policy NC12 Public Art Contribution**

**Do you have any comments on the policy?:**

N/A

**Additional Documents**

**Please include comments on other documents below:**

**Please include comments on other documents below::**

N/A

**Additional Files**

**If you have further information you would like to provide you may upload it here.:**

Let 20 LDP.pdf was uploaded



FL/SV10075/20

8 May 2019

Aberdeen City Council  
Marischal College  
Broad Street  
Aberdeen  
AB10 1AB

**BY EMAIL** [ldp@aberdeencity.gov.uk](mailto:ldp@aberdeencity.gov.uk)

Dear Sir / Madam

**ABERDEEN LOCAL DEVELOPMENT PLAN REVIEW – MAIN ISSUES REPORT 2019  
GARTHDEE RETAIL PARK, ABERDEEN**

We act on behalf of M&G Real Estate who represent the Fund that owns Garthdee Retail Park, Aberdeen, and write with reference to the Council's review of the Aberdeen Local Development Plan.

Our clients take a keen interest in development planning issues and welcome the opportunity to comment on the Main Issues Report.

The Local Development Plan (LDP) contains planning policies and direction for sustainable growth in Aberdeen City. It is a statutory document, with the current Plan adopted in 2017. The Council are now preparing the next LDP, which they expect to adopt in 2022.

The Main Issues Report (MIR) is the first stage in producing a revised and updated LDP. The role of the MIR is to stimulate discussion on the main planning issues facing Aberdeen and to suggest possible options for dealing with them. The Main Issues Report includes 12 Main Issues, and 27 consultation questions for comment.

**Garthdee Retail Park**

Our client's Funds interests at Garthdee Retail Park extend to include B&Q Warehouse, Boots and Currys / PC World as follows:-

Unit	Occupier	SQFT	SQM
1	B&Q	89600	8324
2	Currys / PC World	10000	929
3	Boots	15000	1393

Both Asda Supercentre and a Sainbury's Supermarket trade from adjacent sites. M&G's interests extend to circa. 114,600 sq ft.

A plan highlighting the extent of our client's interests at Garthdee is attached.

As previously discussed with the Council, the retail park trades extremely well with current tenants enjoying long leases. The nature of our client's interests is such that any effect on the footfall of anchor units such as Boot's will negatively affect not only that tenant, but the wider scheme.

## **Development Proposals**

We note that the Council continue to consider opportunities associated with the so-called Bridge of Dee study.

We understand that the need for a new crossing will be reviewed after a period of operation of the new Aberdeen Western peripheral Route.

The existing crossing over the dee at Garthdee is however listed and is of historic and cultural significance. Any change to the roads infrastructure would be required to respect that.

As the Council will be aware, our client's Funds has aspirations to develop land at Garthdee Retail Park for further commercial development.

Our client's Fund is in the process of developing revised proposals for the retail park.

## **Planning Policy Context**

The development plan for the subject site comprises the Aberdeen City and Shire Structure Plan, 2009 and the Aberdeen City Council Local Development Plan adopted 29 February 2012 and together represent an up to date position on development plan policy. The Council are in the process of preparing a new Local Development Plan (LDP).

Scottish Planning Policy represents a primary material consideration in the determination of the subject proposals.

Garthdee Retail Park is identified as a retail park in the Local Development Plan.

## **Strategic Development Plan**

In terms of the structure plan, and consistent with its approach to ensure sustainable development, the objective of the economic strategy is stated as being *"to provide opportunities which encourage economic development and create new employment in a range of areas that are both appropriate for and attractive to the needs of different industries, while at the same time improving the essential strategic infrastructure necessary to allow the economy to grow over the long term."*

Paragraph 4.2 of the structure plan states that *"a strong service sector is also important and in particular, retail and all forms of tourism, including business tourism, will have a role to play. It is very important that retail services throughout the region are promoted to guarantee the vitality and viability of our town centres, while creating opportunities for growth in the economy. It is particularly important that we support Aberdeen city centre to improve regional shopping facilities. In line with Scottish Planning Policy, a sequential approach will be taken when identifying sites for new retail development across the Structure Plan area."*

Aligned with the creation of sustainable communities paragraph 4.31 of the plan states that *"to create sustainable mixed communities, retail services must be one of the main considerations in preparing masterplans and development briefs for new development. We will take a sequential approach to new retail development. However, we will also support existing retail centres to make sure that the needs of the community are met now as well as in the future."*

## **Local Development Plan**

The Local Development Plan supports investment in the city, and sustainable economic development.

Policy RT1 of the local development plan relates to the Sequential Approach and Retail Impact. It is stated that:-



*“All retail, commercial, leisure and other development appropriate to town centres should be located in accordance with the hierarchy and sequential approach as set out below and detailed in Supplementary Guidance: Hierarchy of Retail Centres:-*

- *Tier 1 – Regional centre*
- *Tier 2 – Town centres*
- *Tier 3 – District centres*
- *Tier 4 – Neighbourhood Centres*
- *Retail Parks....”*

### **Supplementary Planning Documents / Guidance**

The Council's Supplementary Guidance: Hierarchy of Retail Centres dated March 2012 confirms the retail park status of Garthdee and states that as such it is appropriate for large bulky comparison if city centre / town centre sites are not available – i.e. subject to sequential test.

The policy position reflects that which has developed at the retail park to date.

### **Scottish Planning Policy**

Paragraph 24. of SPP states that *“the Scottish Government’s central purpose is to focus government and public services on creating a more successful country, with opportunities for all of Scotland to flourish, through increasing sustainable economic growth.”* Further it states at paragraph 27. that *“the Government Economic Strategy indicates that sustainable economic growth is the key to unlocking Scotland’s potential and outlines the multiple benefits of delivering the Government’s purpose, including creating a supportive business environment, achieving a low carbon economy, tackling health and social problems, maintaining a high-quality environment and passing on sustainable legacy for future generations.”*

In this respect it is stated that *“this SPP introduces a presumption in favour of development that contributes to sustainable development.”*

Paragraph 68. of SPP states that *“development plans should adopt a sequential town centre first approach when planning for uses which generate significant footfall, including retail and commercial leisure uses, offices, community and cultural facilities and, where appropriate, other public buildings such as libraries, and education and healthcare facilities.”*

SPP requires that locations are considered in the following order of preference:-

- town centres (including city centres and local centres);
- edge of town centre;
- other commercial centres identified in the development plan; and
- out-of-centre locations that are, or can be, made easily accessible by a choice of transport modes.

As a ‘commercial centre’ in the context of SPP, there is support for investment and improvement where such investment will not undermine town centres.

### **Main Issues Report 2019**

Garthdee continues to be identified as a Commercial Centre in the MIR, part of a network of centres across the plan area. Commercial Centres are preferred for retail development after city centre and other identified centres subject to the sequential approach to site selection.

The extent of my client Fund's retail interests at Garthdee, including B&Q, are included within the current policy designation. Land to the south of the existing B&Q is presently covered by environmental designations related to the River Dee.

### **Question 9 - Out of Town Retailing**

The Council intend to modify the role of Commercial Centres so they support and promote a wider range of uses within them which our client would welcome.

The Main Issues Report states that:-

*"Current policy supports bulky goods only. However, SPP paragraph 63 states that commercial centres have a more specific focus on retailing and/or leisure uses, such as shopping centres, commercial leisure developments, mixed retail and leisure developments, retail parks and factory outlet centres."*

A further challenge to the town centre first approach and the network of centres is out of town retail parks. Due to the imminent opening of the Aberdeen Western Peripheral Route (AWPR), in addition to residential and business development allocations in the LDP, Aberdeen will continue to be attractive to retailers.

Out of town retail parks could risk weakening the existing and established centres within Aberdeen and be counterproductive to the town centre first principle and our sequential approach.

The Council are seeking views on whether high footfall uses should continue to be directed to existing centres including the city centre, and whether the new LDP should consider new out of town retail parks.

### **Representations**

In light of the above context our client makes the following representations to the Council:-

- Continue to identify Garthdee Retail Park is an established commercial centre; part of the development plan retailing hierarchy;
- Explore in detail the opportunity across the existing hierarchy of centres to accommodate additional retail development, including at Garthdee;
- Continue to acknowledge the role of defined centres in the LDP;
- Proceed to make modification to the Plan such that the role of Commercial Centres in the LDP so they support and promote a wider range of uses within them.
- Direct commercial leisure uses towards existing identified centres in accordance with SPP.

We trust that the above and attached will be given due regard in the process to prepare the Proposed Plan.

Our clients take a keen interest in development planning issues and would be keen to be kept advised of the progress in preparing the new Local Development Plan.

We would of course be pleased to discuss matters further with the Council if that would assist.

Should you require any further information at this stage, however, please do not hesitate to contact Fraser Littlejohn or Lisa Proudfoot of this office direct.

Yours faithfully

A large black rectangular redaction box covering the signature area.

**MONTAGU EVANS LLP**

Enc

cc M&G

# Garthdee Retail Park

Aberdeen, AB10 7QA



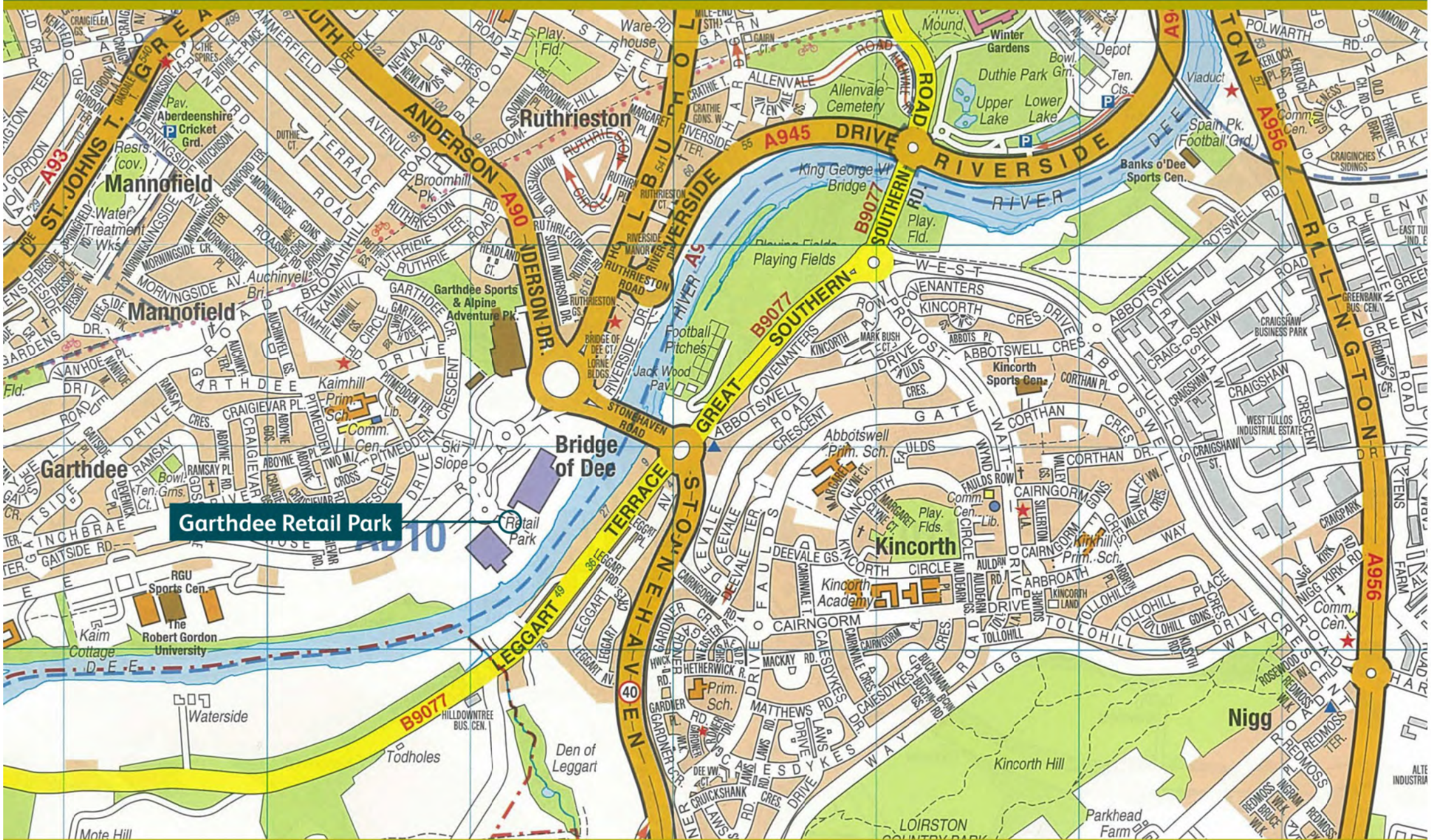
# Garthdee Retail Park

Aberdeen, AB10 7QA



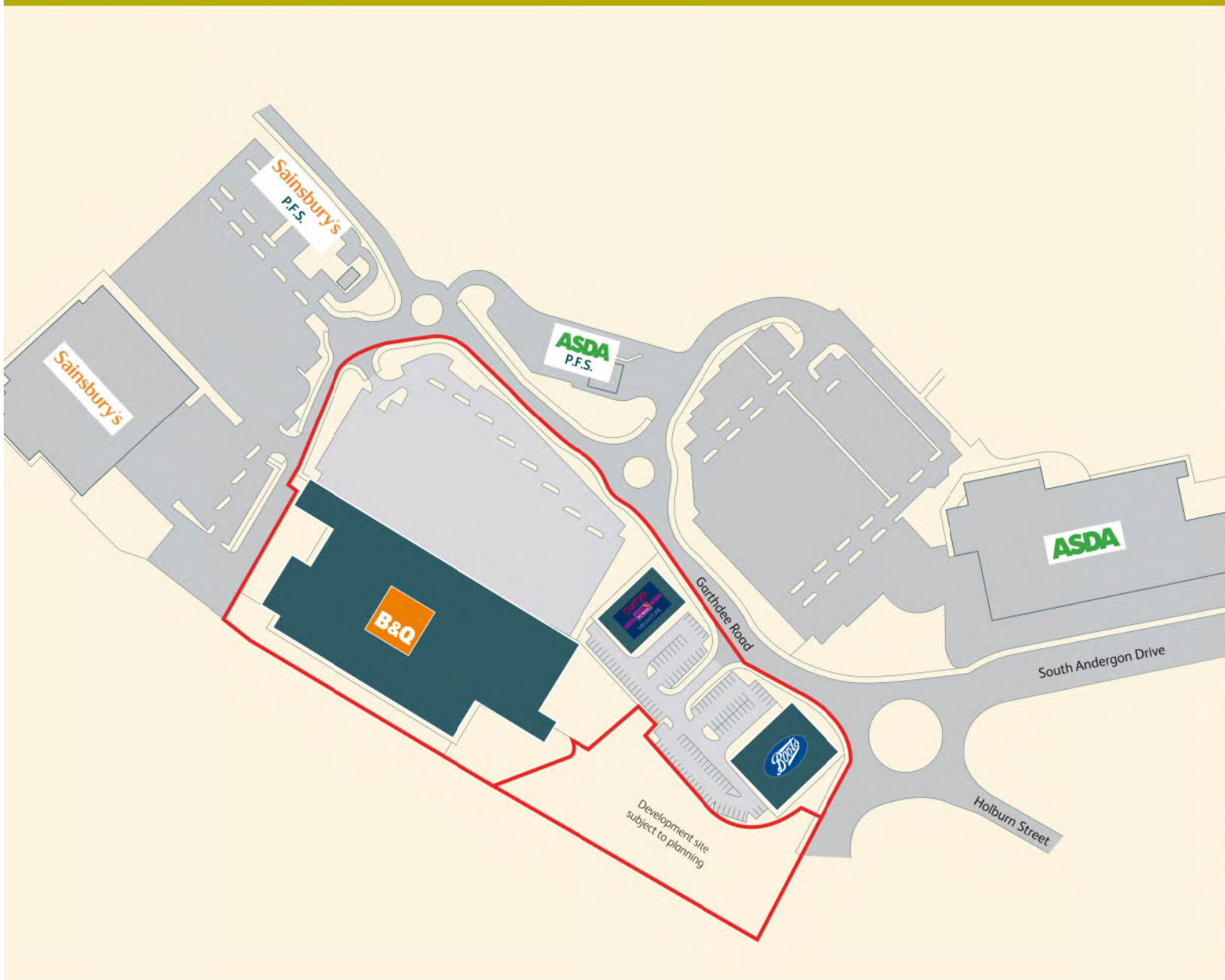
# Garthdee Retail Park

Aberdeen, AB10 7QA



# Garthdee Retail Park

Aberdeen, AB10 7QA



Unit	Retailer	Size
1	B&Q	89,600 sq ft
2	Currys / PC World	10,000 sq ft
3	Boots	15,000 sq ft

# Garthdee Retail Park

Aberdeen, AB10 7QA





# Garthdee Retail Park

Aberdeen, AB10 7QA

## Scheme details

### Location

Garthdee is a cluster of 5 retail warehouse stores located to the south of Aberdeen off the A 90 one of the main arterial routes in and out of the city, within close proximity to the Bridge of Dee. In addition to B&Q, Boots and Currys/PC World, there is an Asda Supercentre (c. 150,000 sq ft / 13,935 sq m ) and Sainsbury's (c. 80,000 sq ft / 7,432 sq m ).

### Scheme Size

114,600 sq ft (10,647 sq m)

### Existing Occupiers

Currys/PC World, Boots and B&Q

### Planning Consent

Class 1 (non food)

## For further information



Richard Noble



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The landlord has regard to the recommendations of the voluntary Code of Practice for Commercial Leases in England and Wales. If you are professionally represented you should ask your adviser for a copy. Alternatively the document can be found at [www.commercialleasecodeew.co.uk](http://www.commercialleasecodeew.co.uk) or obtained from the Royal Institution of Chartered Surveyors. Tel: 020 7334 3806.

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